



SYSTEMATIC
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18 December 1991

Fraser R. Lockhart, Director
Environmental Restoration Division
Department of Energy
Rocky Flats Office
Golden, CO 80402-0928

Re: Review of Comment Responses and Revised Text of Final Draft: Phase I RFI/RI
Work Plan: RFP OPWL (OU 9) December 1991

Dear Fraser:

I have reviewed both the revised text and the comment response document referenced. I have not provided detailed comments because basically I find that the contractor has not responded to DOE's comments. Although our comments reached the contractor approximately one month ago (dated 15 November), none of the substantive issues has been resolved due to "lack of time." However, these issues are not new nor unique to OU9; they have been consistently cited in earlier workplans. Since they have not been addressed earlier, they have not been addressed here, either.

I recognize that there is an extreme schedule constraint on the workplan preparation. However, the comments from EPA, from CDH and DOE's staff and support contractors indicate a fundamental underlying problem set that is not being solved by continuing to submit drafts and final drafts containing the same problems. We continue to defer the work needed in scoping the workplan to later in the process. We continue to ignore or do an insufficient job of addressing DQOs, baseline risk assessment and environmental evaluation methodologies. There is no evaluation of the current knowledge of the site, the land use plans in the county, the data available on the aquifers, etc, from other sources, and in general, the state of environmental conditions in the area of RFP.

ADMIN RECORD

0009-A-000060

"Controlling The Future"

Lockhart
18 December 1991
OU 9 Comment Resolution
BSA

Having reviewed EPA and CDH rejection of the OU 5 revised workplan and the systemic problems which are common to these workplans, I would recommend that DOE not submit the revised workplan to the regulators in its current form. The common and systemic problems need to be defined by DOE and corrected by DOE, its support and M&O contractor and incorporated into the other workplans as they are revised and finalized. I believe continuing to submit workplans which (1) do not respond to DOE's direction and comments and (2) demonstrate no "lessons learned" from earlier submittals will adversely affect DOE's relationship with the regulators more than missing schedule dates.

Sincerely,

Beverly S. Ausmus, PhD